Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ROBROY INDUSTRIES - TEXAS, LLC, a Texas corporation, and ROBROY INDUSTRIES, Inc., a Pennsylvania corporation, Plaintiffs, v. THOMAS & BETTS CORPORATION, a Tennessee corporation, Defendant.	Case No. 2:15-cv-512-JRG JURY TRIAL DEMANDED

DECLARATION OF BOGDAN DIACONESCU IN SUPPORT OF THOMAS & BETTS' MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404 OR TO STAY

I, Bogdan Diaconescu, hereby declare:

1. I submit this declaration in support of Thomas & Betts' Motion to Transfer Venue under 28 U.S.C. § 1404 or to Stay.

2. I am the Product Manager – Conduit & Fittings for Thomas & Betts. Through this role, I have firsthand knowledge of Thomas & Betts' PVC-coated steel conduit business. Thomas & Betts operates its PVC-coated steel conduit business under the trade name Ocal.

3. Ocal operated as a distinct corporate entity until 1998 when Thomas & Betts acquired Ocal.

4. Thomas & Betts and Robroy are competing manufacturers of PVC-coated steel or aluminum conduit. Conduit is steel pipe through which electrical wires are run.

5. Regular uncoated steel conduit is susceptible to corrosion, especially where the conduit is exposed to saltwater or chemicals.

6. The PVC-coated conduit is first coated with a layer of zinc, and then an additional layer of PVC is applied over the zinc.

7. The conduit is used in many industries, including waste and waste water treatment; oil and gas; chemical; mining; and commercial infrastructure, among others.

8. Underwriters Laboratories ("UL") has promulgated a standard for PVC-coated conduit known as UL 6.

9. UL certifies products of manufacturers which meet these UL standards.

10. In order for conduit to be listed as UL 6, the conduit must have an undisturbed zinc coating covering the steel.

11. If the zinc coating is compromised through any means including manufacture, shipment, installation or use, with the underlying layer of zinc disturbed, corrosion may adversely impact the metal conduit body.

12. The Ocal product has been UL 6 certified or listed.

13. I understand that in 1996, the market for rigid PVC-coated steel conduit consisted primarily of two manufacturers – Ocal and Robroy.

14. Throughout the years, Robroy and Ocal sought to distinguish its conduit as superior to the other brand.

15. In or about 2010, I understand that the Robroy conduit was not identified in marketing materials as having zinc as its "primary corrosion protection" under UL 6. Instead, the Robroy conduit was identified in marketing materials as having PVC as its primary corrosion protection.

16. After Robroy's conduit was marketed as having PVC, not zinc, as its primary corrosion protection, it is my understanding that Thomas & Betts revised some of its product literature to reflect the fact that the Ocal brand exclusively had zinc as its primary corrosion protection.

17. Through Robroy's March 10, 2015 letter directed to Thomas & Betts, Robroy advised that the Robroy conduit had once again secured the UL 6 listing.

18. Since receiving Robroy's March 10, 2015 letter, Thomas & Betts has taken ongoing action to identify, retrieve and revise all of its marketing materials which reflected that Ocal exclusively secured UL 6 certification or listing.

19. I declare under penalty of perjury under the laws of the United States of America that statements in this declaration are true and correct.

Date: June 2, 2015

Bogdan Diaconescu